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**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

EDUCATIONAL IMPACT, INC.	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	DOCKET NO.: 3:14-CV-00937-FLW-LHG
v.	:	
CHARLOTTE DANIELSON	:	Motion Date: November 3, 2014
12 Gordon Way	:	(Oral Argument Requested)
Princeton, NJ 08540	:	
	:	
and	:	
OUTCOMES ASSOCIATES, INC.	:	
12 Gordon Way	:	NOTICE OF MOTION OF THE
Princeton, NJ 08540	:	DANIELSON DEFENDANTS JOINING
	:	DEFENDANT TEACHSCAPE INC.'S
	:	MOTION TO ENJOIN PROSECUTION
and	:	OF CUSTOMER HARASSMENT SUITS
THE DANIELSON GROUP LLC	:	
12 Gordon Way	:	
Princeton, NJ 08540	:	
	:	
and	:	
TEACHSCAPE, INC.	:	
71 Stevenson Street	:	
5th Floor	:	
San Francisco, CA 94105	:	
	:	
Defendants.	:	

PLEASE TAKE NOTICE that on November 3, 2014, at 9:00 a.m., or as soon thereafter as counsel may be heard, Defendants Charlotte Danielson, Outcomes Associates, Inc., and the Danielson Group LLC (collectively, the “Danielson Defendants”), through their undersigned counsel, will move the Court before the Honorable Freda L. Wolfson, at Room 5-E of the Clarkson S. Fisher Building and United States Courthouse, 402 E. State Street, Trenton, New Jersey 98608, for entry of an Order, pursuant to Fed. R. Civ. P. 62 and the Court’s inherent authority, enjoining Plaintiff Educational Impact, Inc., on the basis of the “first-filed rule” as adopted by the Third Circuit, from prosecuting litigations duplicative of this case and based on the same core facts of this case in an effort to harass customers who have purchased products from Teachscape.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the Danielson Defendants rely upon and incorporate by reference the Memorandum of Law filed by Defendant Teachscape, Inc. in support of its Motion to Enjoin Prosecution of Customer Harassment Suits, dated September 30, 2014 [Docket No. 38-1], including the accompanying certification of counsel [Docket No. 38-2], and Exhibits 1-4 thereto [Docket Nos. 38-3 – 38-6]. The arguments raised therein, which are equally applicable to the Danielson Defendants such that no separate brief is necessary, are incorporated herein by reference.

Dated: New York, New York
October 8, 2014

STORCH AMINI & MUNVES PC

By: s/ Lita Beth Wright
Lita Beth Wright
Of Counsel:
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